EXHIBIT 18

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

TERRY LYNN KING,) Civil Action No. 2:18 av. 01224
Plaintiff,) Civil Action No. 3:18-cv-01234
v.) CAPITAL CASE
TONY PARKER, et al.,) Judge William L. Campbell, Jr.
Defendants.)

AFFIDAVIT OF JOHN GARDINER PURSUANT TO 28 U.S.C. § 1746

- 1. My name is John Gardiner. I am an investigator in the Capital Habeas Unit at the Federal Community Defender Office for the Eastern District of Pennsylvania.
- 2. On September 28, 2021, I, along with attorneys Jeremy Gunn, Alex Kursman, Lynne Leonard, and Sarah Miller, visited Riverbend Maximum Security Institution to inspect Tennessee's execution chamber.
- 3. During the visit, I took several measurements of the execution chamber. Those measurements, along with a few notes, are attached to this declaration as Exhibit A.

I hereby verify under penalty of perjury, subject to 28 U.S.C. § 1746, that the foregoing and the accompanying Exhibit are true and correct.

Date: april 11, 2022

John Gardiner

John T. Dandman

Execution Chamber

(all measurements provided in inches, except where otherwise noted)

Layout and Gurney Position	
Dimensions of the Execution Chamber	188 x 239
Is the gurney secured to the floor? (If yes, how?)	Yes, bolted to the floor but movable. (Same for electric chair.)
Is the inmate's left or right side closer to the Executioner's chamber	left
Length of gurney	78
Width of gurney	24 at narrowest 29.5 at widest Each arm rest = 7 wide x 21.5 long
Number of straps on the gurney	10
Describe how the straps are positioned/arranged	6-point crisscross over torso, plus 3 straight across legs
Are the straps adjustable (buckles?)	yes
Portal	
Thickness of wall separating Executioner Chamber and Execution Chamber	9
Dimensions of portal	6 x 8
Distance from floor to bottom of portal	43
Gurney to Wall Portal	
Distance from portal to the L side of the head of the gurney	42
Distance from portal to the middle of the gurney's L side	37

Distance from portal to the L foot of the gurney	61
Distance from portal to the R side of the head of the gurney (w/tape measure going over the gurney)	53
Distance from portal to the R side of the head of the gurney (w/tape measure going under the gurney)	87
Distance from portal to the middle of the gurney's R side (w/tape measure going over the gurney)	53
Distance from portal to the middle of the gurney's R side (w/tape measure going under the gurney)	80
Distance from portal to the R foot of the gurney (w/tape measure going over the gurney)	70
Distance from portal to the R foot of the gurney (w/tape measure going under the gurney)	92
Gurney to Observation Rooms	
Distance from center of the official witness window to the middle of the gurney	205
Distance from R edge of the official witness window to the middle of the gurney	194
Distance from L edge of the official witness window to the middle of the gurney	216
Distance from center of the victim's family window to the middle of the gurney	70
Distance from R edge of the victim's family window to the middle of the gurney	87
Distance from L edge of the victim's family window to the middle of the gurney	75
Camera	
How many cameras are in the Execution Chamber?	2 + an empty slot
Where are the cameras positioned?	 One centered directly above gurney (72 in.) One opposite viewing rooms, to the left of media witness room

Lethal Injection Executioner's Room

Dimensions of Executioner's Chamber	119 x 64
IV Pole	
Distance from the top of the IV pole to the portal	52
Distance from the floor to the top of the IV pole	95 (IV pole is hanging from ceiling)
Where is the port into which they inject the drugs located? (closer to the IV bag vs. closer to the window portal)	Closer to the IV bag
Window	
Dimensions of window	26.5 x 16.75 - Tinted looking out into execution chamber - Mirrored looking into from execution chamber - Huge digital clock directly above this window (visible from execution chamber)
Cameras	
Where is the pan tilt zoom camera screen located in the Executioner's chamber?	Top left corner near door Screen = 11.5 x 20

Equipment

Syringes	
Size of syringe	1.6mm x 40mm
After the syringes are prepared how are they arranged? (Are they secured?) (Each set in a separate tray?)	Red set and blue set each have their own separate trays with separate slots labelled 1-9 for each syringe

Victim's Family Observation Room

Dimensions of the room	158 x 85
Seating	
Chairs or benches?	Chairs
How many?	Nine
How are they are positioned? (Rows?)	Two rows
Are the rows flat or raised like stadium seating?	Flat
Distance from each row to the window	47; 85
Window	
Dimensions of the window	83 x 36
Distance between floor and bottom of the window	42

Official Witness Observation Room

Dimensions of the room	191 x 162
Seating	
Chairs or benches?	Chairs (nicer than victim's family room chairs)
How many?	Fifteen
How are they are positioned? (Rows?)	Three rows

Are the rows flat or raised like stadium seating?	Flat Plastic COVID barriers between each
Distance from each row to the window	58; 107; 157
Window	
Dimensions of the window	37.5 x 18 per pane (Four total panes lined up adjacent to one another)
Distance between floor and bottom of the window	42